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April 25, 2017

Mr. Scott Armstrong CA Regional Water Quality Control Board, Central Valley Region 11020 Sun Center Rancho Cordova, CA

Re: Monarch Nut Pistachio and Blueberry Facility

Comments on Tentative Waste Discharge Requirements

Dear Mr. Armstrong:

On behalf of Monarch Nut Company (**Monarch**), this letter is provided to address the Tentative Waste Discharge Requirements received from the Regional Water Quality Control Board (**Water Board**) on March 28, 2017. The following corrections are requested:

Comment 1:

Page 4 Finding 8: Should read:

"In 2014 the discharge began to convert to a dry-hulling process...."

Comment 2:

Monitoring and Reporting Program Order R5-2017-XXXX page 3:

Wastewater Lagoon Monitoring; Freeboard Units and precision: request change from 0.1 feet to 0.5 feet.

Comment 3:

Page 6: Table, Row 3 Infusion Plant. Under Wastewater Column

Change: "Vault 5" to "Vault 4"

Comment 4:

Page 8 Finding 22

Change: "Pond 2" to "Pond 4"

Comment 5:

Page 23 Finding B .1.

The values here are correct but inconsistent with the Information Sheet page 2 "Flow and Effluent Limitations".

Correct Information Sheet to read "... 98 Million gallons, with a maximum of 1.5 million gallons per day".

Comment 6:

Attachment F: Strom Water Flow Schematic

Pond 2 (unlined) should be changed to Pond 4 (unlined)

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Comment 7:

Page 20 Finding 73.

Wording inaccurate; Modify to address:

- 1. The current IGP is the 2014-0057-DWQ not the 97-03-DWQ.
- 2. The facility was not covered under the 97-03-DWQ confirmed with the SWRCB via email 4/5/17. As stated in Tentative Waste Discharge Requirements storm water does not discharge off site, therefore, neither an NOI or other submittals are necessary.

Your prompt review of our response to comments would be greatly appreciated and if you have any questions please let me know.

Respectfully,

David Norman

Lave Jamon

Principal Environmental Specialist

cc: Dina Calanchini, RWQCB

Rick Meridith, Monarch Nut Company

Loren J. Harlow, Esq. Baker Manock & Jensen, PC